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Attorney for Plaintiffs
DAREN HEATHERLY;
IRMA RAMIREZ; and BENSON KINNEY JR.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DAREN HEATHERLY; IRMA RAMIREZ;)
and HARRISON BENSON KINNEY JR.,)
Plaintiffs,)
v.)
SONOMA COUNTY FAIR and)
EXPOSITION, INC.; and COUNTY of)
SONOMA,)
Defendants.)

CASE NO. CV-13-4327-KAW
STIPULATION RE CONTINUING
DEADLINE FOR THE PARTIES TO
CONDUCT THE JOINT SITE
INSPECTION; and ~~[PROPOSED]~~ ORDER
THEREON

Plaintiffs DAREN HEATHERLY; IRMA RAMIREZ and BENSON KINNEY JR., and
Defendants SONOMA COUNTY FAIR and EXPOSITION, INC.; and COUNTY of SONOMA,
by and through their respective attorney of record, respectfully request and stipulate, as follows:

1. **Whereas**, all defendants have been served with the summons and complaint and have answered plaintiffs' complaint; and

2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties were to have the Joint Site Inspection at the Sonoma County Fairgrounds, located at/near 1350 Bennett Valley Road, Santa Rosa, California completed by no later than January 1, 2014.

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**STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and
[PROPOSED] ORDER THEREON** **CASE NO. CV-13-4327-KAW**

The parties had agreed to conduct the inspection on February 12, 2014; however, plaintiffs' expert was ill. Therefore, the parties were unable to have the General Order 56 Joint Site Inspection as scheduled; and

3. **In light of the above**, the parties have agreed to reschedule and conduct the joint site inspection on April 1, 2014.

IT IS SO STIPULATED:

That, plaintiffs DAREN HEATHERLY; IRMA RAMIREZ; and BENSON KINNEY JR., and defendants SONOMA COUNTY FAIR and EXPOSITION, INC.; and COUNTY of SONOMA agree, stipulate and respectfully request that the last day for the parties and counsel to conduct the General Order 56 Joint Site Inspection of the premises be continued up to and including April 11, 2014.

This stipulation may be executed in counterparts and have the same force and effect as though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall have the same force and effect as originals.

Respectfully submitted,

Dated: February 25, 2014

THOMAS E. FRANKOVICH, Esq.

A PROFESSIONAL LAW CORPORATION

By: ____/s/Thomas E. Frankovich_____

Thomas E. Frankovich

Attorney for Plaintiffs DAREN HEATHERLY;
IRMA RAMIREZ; and BENSON KINNEY JR.

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STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and
[PROPOSED] ORDER THEREON

CASE NO. CV-13-4327-KAW

1 Dated: February 27, 2014

BERTRAND, FOX & ELLIOT,

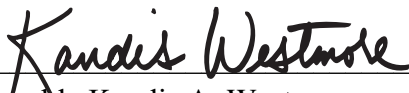
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3 By: _____/s/Eugene B. Elliot_____
4 Eugene B. Elliot, Esq.

5 Attorneys for Defendants SONOMA COUNTY
6 FAIR and EXPOSITION, INC.; and COUNTY of
7 SONOMA

8 **PROPOSED ORDER**

9 **IT IS SO ORDERED**, that the last day for the parties and counsel to conduct the joint site
10 inspection of the premises be continued up to and including 4/11, 2014.

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13 Dated: 3/5, 2014


14 Honorable Kandis A. Westmore
15 United States Magistrate Judge of California
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